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*Signature of Clerk or Deputy Clerk*

# ATTACHMENT A

Nico Banks, Esq.  
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Filing on behalf of all Plaintiffs  
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Unit #8571,  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH;	)	Case No.: 2:24-cv-02886-WLH
AMUND THOMPSON;	)	
ISABEL RAMOS;	)	<b>FIRST AMENDED COMPLAINT</b>
ANTHONY RAMOS;	)	<b>FOR:</b>
MICHAEL NIBARGER	)	<b>1. FRAUD CONSPIRACY</b>
	)	<b>2. AIDING AND ABETTING</b>
Plaintiffs,	)	<b>FRAUD</b>
vs.	)	<b>3. FRAUDULENT TRANSFERS</b>
	)	<b>IN FURTHERANCE OF</b>
RYAN CARROLL;	)	<b>CONSPIRACY</b>
MAX K. DAY;	)	<b>CLASS ACTION</b>
MAX O. DAY;	)	
MICHAEL DAY;	)	<b>DEMAND FOR JURY TRIAL</b>
JARED DAY;	)	
MATTHEW CROUCH;	)	
CHRISTINE CARROLL;	)	
TROY MARCHAND;	)	
BONNIE NICHOLS;	)	
TRAVIS MARKER;	)	
REYHAN PASINLI;	)	
YAX ECOMMERCE LLC; PRECISION	)	
TRADING GROUP, LLC;	)	
WA DISTRIBUTION LLC;	)	
PROVIDENCE OAK PROPERTIES,	)	
LLC;	)	
WA AMAZON SELLER LLC;	)	

1 YAX IP AND MANAGEMENT INC.  
(D.B.A. “FULFILLABLE”);  
2 MKD INVESTMENT ADVISOR, LLC;  
3 MKD FAMILY BENEFICIARY, LLC;  
MKD FAMILY PRIVATE  
4 MANAGEMENT COMPANY, LLC;  
5 MAX DAY CONSULTING, LLC;  
HOUTEX FARM EQUITY PARTNERS  
6 LLC;  
7 BUSINESS FINANCIAL SOLUTIONS  
ADVISORY LLC;  
8 EVO MAXX LLC;  
9 WWKB LLC;  
DREAMS TO REALITY LLC;  
10 QUANTUM ECOMMERCE, LLC;  
11 WHOLESALE UNIVERSE, INC.;  
THE LAW OFFICE OF TRAVIS R.  
12 MARKER, A PROFESSIONAL  
13 CORPORATION (D.B.A. “MARKER  
LAW AND MEDIATION”);  
14 PARLAY LAW GROUP A  
PROFESSIONAL CORPORATION;  
15 TOTAL-APPS, INC.;  
16 WELLS FARGO BANK, N.A.

17  
18 Defendants.

19 **FIRST AMENDED COMPLAINT — CLASS ACTION**

20 Plaintiffs David Hough, Amund Thompson, Isabel Ramos and Anthony  
21 Ramos, and Michael Nibarger (collectively, “Plaintiffs” or “Class Representatives”),  
22 individually and on behalf of others similarly situated, by and through their attorneys,  
23 bring this class action complaint against the following Defendants: (1) Ryan Carroll;  
24 Max K. Day; Max O. Day; Michael Day; Jared Day; Matthew Crouch; Christine  
25 Carroll; Troy Marchand; Bonnie Nichols; Travis Marker; and Reyhan Pasinli  
26  
27  
28

# ATTACHMENT B

ATTACHMENT #2 TO SUMMONS

**DEFENDANTS TO BE SERVED:**

RYAN CARROLL;  
2900 NE 7th Ave,  
Unit 2502,  
Miami, Florida 33137

MAX K. DAY;  
18210 Farnsfield Drive,  
Houston, Texas 77084

MAX O. DAY;  
3118 Brandon Hill Lane,  
Sugar Land, Texas 77479

MICHAEL DAY;  
25010 Ginger Ranch Drive,  
Katy, Texas 77494

JARED DAY;  
19710 Chara Ct,  
Cypress, TX 77433

MATTHEW CROUCH;  
9566 Greiner Rd,  
Clarence, NY 14031

CHRISTINE CARROLL;  
11298 Snow View Ct,  
Yucaipa, CA 92399

TROY MARCHAND;  
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Fishers, IN, 46037

BONNIE NICHOLS;  
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TRAVIS MARKER;  
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YAX ECOMMERCE LLC;  
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7th Ave, Unit 2502,  
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PRECISION TRADING GROUP, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

WA DISTRIBUTION LLC;  
2900 NE  
7th Ave, Unit 2502,  
Miami, Florida 33137

PROVIDENCE OAK PROPERTIES, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

WA AMAZON SELLER LLC;  
2900 NE  
7th Ave, Unit 2502,  
Miami, Florida 33137

YAX IP AND MANAGEMENT INC.;  
P.O. Box 1505  
Austin, TX 78767

MKD INVESTMENT ADVISOR, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

MKD FAMILY BENEFICIARY, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

MKD FAMILY PRIVATE MANAGEMENT COMPANY, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

MAX DAY CONSULTING, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

HOUTEX FARM EQUITY PARTNERS LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

BUSINESS FINANCIAL SOLUTIONS ADVISORY LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

EVO MAXX LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

WWKB LLC  
25010 Ginger Ranch Drive,  
Katy, Texas 77494

DREAMS TO REALITY LLC  
2900 NE  
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Miami, Florida 33137



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TOTAL-APPS, INC.  
c/o Aaron C. Watts  
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#707  
Laguna Niguel, CA 92677

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350 N. St. Paul Street,  
Dallas, TX, 75201